

The Honorable Mary Alice Theiler

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT KOCHENDORFER,
Plaintiff,
vs.
METROPOLITAN PROPERTY &
CASUALTY INSURANCE COMPANY,
Defendant.

) Case No. C11 – 1162-MAT
)
) JOINT MOTION TO EXTEND EXPERT
) DISCLOSURE DEADLINE
)
) **Clerk's Action Required**
)
) NOTE ON MOTION CALENDAR: February
) 27, 2012
)
)

COME NOW Defendant Metropolitan Property & Casualty Insurance Company and Plaintiff Robert Kochendorfer jointly move the Court as follows.

I. STIPULATION

Plaintiff Kochendorfer and Defendant Metropolitan hereby stipulate and agree as follows:

1. Reports of Expert Witnesses are currently due in this matter on March 6, 2012.
2. The parties have discussed the current expert disclosure deadline, and outstanding discovery, and have agreed to extend disclosure of the expert reports.
3. There are depositions necessary to expert reports, and the parties have been unable to find a mutually agreeable date for the depositions to take place, that will allow enough time for the experts to prepare the necessary reports.

JOINT MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE

(W. D. Wash. Cause No. CV11-1162 MAT) – Page 1

1 I 622

THENELL LAW GROUP P.C.
10260 SW Greenburg Rd, Suite 400
Portland, Oregon 97223
Telephone: (503) 892-3936
Facsimile: (503) 892-3942

4. The parties have agreed that the expert report disclosure deadline be moved to April 8, 2012.
5. No other deadlines in this matter will be changed

DATED this 2nd day of March 2012.

THENELL LAW GROUP, P.C.

By: /s/ Jillian M. Hinman
Daniel E. Thenell, WSBA No. 37297
Email: dan@thenelllawgroup.com
Jillian M. Hinman, WSBA No. 40665
E-mail: jillian@thenelllawgroup.com
Telephone: (503) 892-3936
Substituting Attorneys for Defendant
Metropolitan Property & Casualty
Insurance Company

COLE WATHEN LEID & HALL

By: /s/ Rick J. Wathen *
Rick J. Wathen, WSBA No. 25539
E-mail: rwathen@cwlhlaw.com
Telephone: (206) 622-0494
Attorneys for Plaintiff
Robert R. Kochendorfer

* pursuant to email authorization

II. ORDER ON JOINT MOTION

Pursuant to the above Stipulation of the parties, the Court approves the Joint Motion and orders as follows:

1 / 1

1 / 1

1 / 1

1 / 1

JOINT MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE

(W. D. Wash. Cause No. CV11-1162 MAT) – Page 2

1 I 622

THENELL LAW GROUP P.C.
10260 SW Greenburg Rd, Suite 400
Portland, Oregon 97223
Telephone: (503) 892-3936
Facsimile: (503) 892-3942

1. The Expert Report deadline shall be April 8, 2012, in this matter.

SO ORDERED this 5th day of March, 2012.

Maele Dederlin

Mary Alice Theiler
United States Magistrate Judge

Presented by:

THENELL LAW GROUP, P.C.

By: /s/ Jillian M. Hinman
Daniel E. Thenell, WSBA No. 37297
Email: dan@thenelllawgroup.com
Jillian M. Hinman, WSBA No. 40665
E-mail: jillian@thenelllawgroup.com
Telephone: (503) 892-3936
Substituting Attorneys for Defendant
Metropolitan Property & Casualty Insurance Company

COLE WATHEN LEID & HALL

By: /s/ Rick J. Wathen *
Rick J. Wathen, WSBA No. 25539
E-mail: rwathen@cwlhlaw.com
Telephone: (206) 622-0494
Attorneys for Plaintiff Robert R. Kochendorfer

* pursuant to telephone authorization

JOINT MOTION TO EXTEND EXPERT DISCLOSURE DEADLINE

(W. D. Wash. Cause No. CV11-1162 MAT) – Page 3

1 I 622

THENELL LAW GROUP P.C.
10260 SW Greenburg Rd, Suite 400
Portland, Oregon 97223
Telephone: (503) 892-3936
Facsimile: (503) 892-3942